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February 12, 2020

by ECF

Honorable Ronnie Abrams, U.S.D.J.
US District Court for the S.D.N.Y.
Thurgood Marshall United States Courthouse
40 Foley Square Courtroom 1106
New York, NY 10007

Re: *Castrillon v. Ben-Amun Co., Inc.*, 1:19-cv-09228-RA

Dear Judge Abrams:

Both Parties hereby jointly move the Court for the entry of an Order pursuant to Federal Rule of Evidence 502(d) governing the disclosure of documents during discovery. The parties suggest herewith the proposed language and form thereof.

On this _____ day of _____, 2020, it is ORDERED as follows:

1. The production of privileged or work-product protected documents, electronically stored information ("ESI") or information, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).
2. Nothing contained herein is intended to or shall serve to limit a party's right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness and/or segregation of privileged and/or protected information before production.

Counsel to both parties have reviewed and consented to the language above and to this motion.

Respectfully Submitted,

/s/Ben D Manevitz/

Ben D. Manevitz

[Plaintiff's counsel certifies that this letter motion was served on Defendant's counsel by ECF and email, on this date. /s/Ben D Manevitz/]